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14 Group Unlimited, Inc

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 RICHARD GIBSON, and HERIBERTO  
18 VALIENTE,

Case No. 2:23-cv-00140-MMD-DJA

19 Plaintiffs,

20 v.

21 MGM RESORTS INTERNATIONAL,  
22 CENDYN GROUP, LLC, THE RAINMAKER  
23 GROUP UNLIMITED, INC., CAESARS  
24 ENTERTAINMENT INC., TREASURE  
ISLAND, LLC, WYNN RESORTS  
HOLDINGS, LLC,

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME FOR  
DEFENDANT THE RAINMAKER  
GROUP UNLIMITED, INC. TO  
RESPOND TO THE COMPLAINT  
(FIRST REQUEST)**

25 Defendant.

26 IT IS HEREBY STIPULATED AND AGREED between Plaintiffs Richard Gibson and  
27 Heriberto Valiente (“Plaintiffs”) and Defendant The Rainmaker Group Unlimited, Inc.

1 ("Defendant"), by and through their respective counsel and pending the Court's approval, that  
 2 Defendant shall have an additional nineteen days to answer or otherwise respond to the  
 3 Complaint [ECF No. 1]. Defendant's original response deadline is March 8, 2023. With an  
 4 additional nineteen days, Defendant's deadline to respond to the Complaint is extended to March  
 5 27, 2023, and will align with the parties' stipulated deadline to respond to the Complaint for the  
 6 remaining defendants in the case. In the event that Defendant moves to dismiss the Complaint,  
 7 the parties shall meet and confer and thereafter submit to the Court a mutually agreeable  
 8 schedule for further briefing on any such motion.

9 Good cause exists for the extension set forth herein. Defense counsel were only recently  
 10 retained in this matter and require additional time to determine how best to address Plaintiffs'  
 11 Complaint. This is the first extension requested for Defendant to respond to the Complaint and  
 12 is not made for the purpose of delay.

13 Dated: March 8 2023.  
 14  
 15

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11 *Attorneys for Plaintiffs Richard Gibson and  
12 Heriberto Valiente*

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14  
15 **IT IS SO ORDERED:**

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17 

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UNITED STATES DISTRICT JUDGE

18 Dated: \_\_\_\_\_